

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

FILED

July 29, 2021

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS

JTH TAX LLC d/b/a &
LIBERTY TAX SERVICE &
AND &
SIEMPRETAX + LLC, &
Plaintiffs, &
&
&
&
VS. & Case # 6:20-cv-140-ADA
&
Mickey White &
AND &
NATTY'S TAX SERVICE &
Defendants &
&

BY: _____ lad
DEPUTY _____

DEFENDANT MICKEY WHITE RESPONSE TO PLAINTIFFS RESPONSE TO REOPEN CASE

To the Honorable United States District Court.

PLAINTIFFS HAVE ONCE AGAIN FILED FOR A THIRD TIME WITH TOTAL DISREGARD TO COURTS PREVIOUS RULING TO CLOSE THE CASE. DEFENDANT ASK THE COURT TO HONOR THAT RULING AS FOR NOT DOING SO WILL CAUSE THE DEFENDANT UNDUE HARM AND SHOW EXTREME PREJUDICE.

THE PLAINTIFFS HAVE A LEGAL TEAM OF OVER 20 LAWYERS AND ASSOCIATES WHILE DEFENDANT IS FORCED TO REPRESENT HIMSELF DUE TO NOT BEING FINANCIALLY ABLE TO AFFORD A ATTORNEY BECAUSE OF PAST ACTIONS BY LIBERTY TAX.

BY ACCEPTING PLAINTIFFS THIRD ATTEMPT AT LITIGATION WOULD SHOW EXTREME AND UNDUE PREJUDICE TO THE DEFENDANT, THE DEFENDANT HAS SUFFERED TOO MUCH ALREADY AT THE HANDS OF THE PLAINTIFFS. DEFENDANT SUFFERED A DELIBITATING STROKE INSIDE THE LIBERTY TAX OFFICE BROUGHT ON BY THE STRESS AND PRESSURE CAUSED BY LIBERTY TAX NEGILIGENCE AND LIES AND THEIR INABILITY TO KEEP SYSTEMS RUNNING THEREFORE CAUSIMG LOST CLIENTS. DEFENDANT SUFFERED A MASSIVE STROKE AND WOULD HAVE DIED IF NOT FOR PROXIMITY TO HOSPITAL AND HE STILL HAS ONLY 5 PERCENT USE OF HIS LEFT SIDE.

DEFENDANT IS A STROKE SURVIVOR WHO SUFFERS FROM HIGH BLOOD PRESSURE, DIABETES AND SEVERE DEPRESSION WITH THE BLOOD PRESSURE AND DEPRESSION BEING DIRECT RESULTS OF THE STROKE. DEFENDANT IS UNDER EXTREME RISK OF ANOTHER STROKE DUE TO LIBERTY TAX CONSTANT ATTACKS ACCUSATIONS AND LITIGATION.

LIBERTY IS ONCE AGAIN FILING USING THE SAME TERMS LIBERTY MARKS WHICH THEY SAID THEY WOULD NOT BE USED. THEY ALSO HAVE YET TO ACKNOWLEDGE THEIR WRONGDOING EVEN THOUGH COURT HAS COPIES OF THE SETTLEMENTS.

AS A CORPORATION THAT OFFERS FRANCHISES FOR SALE THEY SHOULD BE HELD TO A HIGHER STANDARD AND NOT INVOLVED IN FRAUD, MISREPRESENTATION OR SEXUAL HARASSMENT BUT THEIR SETTLED SUITS SHOW OTHERWISE.

AS A FRANCHISE FOR LIBERTY I RECEIVED REPORTS THAT SHOWED TYPES OF RETURNS FILED, COST AND REFUND AMOUNT SO THEREFORE THEY CANT CLAIM TO HAVE NOT KNOWN WHAT FRANCHISES WERE DOING AND THEREFORE SETTLED. THEY HAVE ALSO NOT ADDRESSED THE NUMBER OF FRANCHISES CLOSED FOR FRAUD. AS A FRANCHISOR THEY ARE RESPONSIBLE FOR THE FRANCHISES JUST AS DEFENDANT IS RESPONSIBLE FOR HIS EMPLOYEES.

I WAS TOLD BY THEIR REPRESENTATIVE JAY CONTERAS TO CHARGE MORE AND TO LIE TO CUSTOMERS THAT THEY WERE GETTING NO INTEREST LOANS WHICH I REFUSED TO DO. I WAS TOLD TO PUT A 50 IN FRONT OF THEM TO FOCUS ON WHILE I WENT OVER OUTRAGEOUS FEES WHICH I ALSO REFUSED TO DO.

THESE ARE NOT THINGS A REPUTABLE COMPANY TEACHES BUT YET THEY DID AND TRIED TO FORCE YOU TO DO.

BY LETTING THE PLAINTIFF FILE A THIRD TIME BASICALLY SAYS THEY CAN KEEP FILING TILL THEY GET IT RIGHT AND OPEN THE DOOR FOR YEARS OF APPEALS.

DEFENDANT TOOK COURT AT ITS WORD THAT CASE WAS CLOSED AND SHREDDED A YEARS WORTH OF RESEARCH ON LIBERTY AND THEIR CRIMINAL BEHAVIOR AND BY LETTING THIS PROCEED WOULD CAUSE DEFENDANT HOURS AND MONTHS OF RESEARCH TO RETRIEVE THAT INFORMATION ONCE AGAIN .

AS A FRANCHISOR THEY REFUSED GIVING CONTACT NUMBERS TO ANYONE AND FORCED YOU TO SEND A EMAIL WHEN DEALING WITH ANY ISSUES RATHER CUSTOMER RELATED OR TECHNICAL AND SOMETIMES HAVE TO WAIT DAYS CAUSING LOSS OF CLIENTS. THEY PROVIDED ONLY ONE POINT OF CONTACT JAY CONTERAS WHICH HAD A SEVERE CONFLICT OF INTEREST BECAUSE HE RECEIVED A LARGE BONUS EVERYTIME HE SOLD OR RESOLD A FRANCHISE, THIS IS CONFIRMED IN IRS LAWSUIT. THIS CAN ALSO BE PROVEN BY OTHERS HE DID THE SAME TOO. JAY CONTERAS WAS DISMISSED AND FORCED TO SIGN A NON DISCLOSURE AGREEMENT TO PREVENT HIM FROM TESTIFYING IN COURT,

THE CONTRACT WAS BROKEN BY LIBERTY BECAUSE OF THEIR ACTIONS AND SINCE THEN CONTRACT HAS EXPIRED , BY LETTING THEM TO CONTINUE TO FILE FRIVOLOUS LAWSUITS AND RUIN PEOPLES LIVES WHILE TAKING NO RESPONSIBILITY FOR THEIR ACTIONS IS A TRAVESTY TO OUR JUSTICE SYSTEM.

DEFENDANT ASK COURT TO PLEASE REVIEW THE SETTLEMENTS THEY MADE AND NEWS ARTICLES SHOWING THEIR WRONGDOING AND NOT LET THIS CASE PROCEED.

DEFENDANT ALSO ASK THE COURT TO ALSO CONSIDER THE PHYSICAL AND MENTAL TOLL THAT ALLOWING THIS TO PROCEED WOULD HEAP ON THE DEFENDANT. DEFENDANT ALSO ASK COURT TO CONSIDER BOTH THE PHYSICAL EMOTIONAL AND FINANCIAL BURDEN PLACED ON THEM ALREADY BY LIBERTY TAX,

LIBERTY TAX OPENED A NEW OFFICE RIGHT ACROSS FROM DEFENDANT AND CALLED ALL PAST CUSTOMERS OFFERING THEM 50 PERCENT OFF TO COME TO THEM. THEY ALSO REPRESENTED TO SOME THAT MYSELF AND OTHERS IN MY OFFICE WERE THERE, THIS ALONE SHOULD SHOW CLIENTS WHO WANTED TO GO TO LIBERTY HAD THAT OPTION.

LIBERTY KNOWS DEFENDANT HAS NO WAY TO PAY THEIR OUTRAGEOUS DEMANDS THAT THEY ARE SIMPLY FILING TO STOP DEFENDANT FROM MAKING A LIVING AND PROVIDING FOR HIS 4 YEAR OLD DAUGHTER.

RECENT LEGISLATION EVEN SHOWS THE US GOVERNMENT HAS PROBLEMS WITH NON COMPETE CLAUSES COMPANIES ARE USING AGAINST PEOPLE,

DEFENDANT HAS NO OTHER WAY TO MAKE A LIVING AND DOES NOT WANT TO LIVE OFF THE GOVERNMENT.

Respectfully submitted

BY MICKEY WHITE

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DEFENDANT PRO SE ON BEHALF OF
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Service